Division of Waste Management and Radiation Control

USED OIL TRANSPORTER PERMIT

Permittee Name:	**Florida Transformer LLC, dba Emerald Transformer**
Permittee Mailing Address:	P.O. Box 507 DeFuniak Springs, FL 32435
Permitting Facility Address	4509 State Hwy 83 North DeFuniak Springs, FL 32435
Permittee Phone Number:	(850) 892-2711 office
Permittee Environmental Contact:	**Jessica Pennington** Dir. Of Safety & Environmental Compliance (850) 892-2711 office (850) 333-8772 cell Email: jpennington@emeraldtransformer.com
Facility Operations Contact:	**Steven Peterson** Los Angeles Facility General Manager 5756 Alba Street Los Angeles, CA 90058 (323) 277- 2500 office (323) 216-0436 cell Email: speterson@emeraldtransformer.com
Type of Permit:	**Used Oil Transporter Permit**
Permit #:	**UOP-00XX**
EPA ID #:	**FLR000168203**

Signature: _____ Date: _____

Scott T. Anderson, Director
Division of Waste Management and Radiation Control

I.A. Effect of Permit

I.A.1. Florida Transformer LLC dba Emerald Transformer (hereafter referred to as "Permittee") is hereby authorized to operate as a Used Oil Transporter in accordance with all applicable requirements of R315-15 of the Utah Administrative Code (UAC) and of the Used Oil Management Act (the Act) 19-6-701 et. seq., Utah Code Annotated and this Permit.

I.A.2. This Permit shall be effective for a term not to exceed ten years in accordance with the requirements of R315-15-15 of the Utah Administrative Code.

I.A.3. Attachments incorporated by reference are enforceable conditions of this Permit, as are documents incorporated by reference into the attachments. Language in this Permit supersedes any conflicting language in the attachments or documents incorporated into the attachments.

I.B. Permit Revocation

I.B.1. Violation of any permit condition or failure to comply with any provision of the applicable statutes and rules may be grounds for enforcement actions, including revocation of this Permit. The Director of the Division of Waste Management and Radiation Control (Director) shall notify the Permittee in writing of his intent to revoke this Permit.

I.C. Permit Modification

I.C.1. The Permittee may request modifications to any item or activity covered by this Permit by submitting a written permit modification request to the Director. If the Director determines the modification request is substantive, a public hearing, a 15-day public comment period or both may be required before any action on the modification request may be taken. Implementing a substantive modification prior to the Director's written approval constitutes a violation of the Permit and may be grounds for enforcement action or permit revocation.

I.C.2. The Permittee shall notify the Director in writing of any non-substantive changes, such as changes to the contact person, within 20 days of the change.

I.C.3. The Director may modify this Permit as necessary to protect human health and the environment, because of statutory or regulatory changes or because of operational changes affecting this Permit.

I.D. Spill Prevention, Emergency Controls and Maintenance

I.D.1. The Permittee shall maintain and operate all used oil transportation vehicles and associated equipment to minimize the possibility of fire, explosion or sudden or non-sudden release of used oil to the air, ground, soil, surface and groundwater and sewer systems.

I.D.2. In the event of a release of used oil, the Permittee shall comply with the Emergency Controls and reporting requirements specified in R315-15-9 of the Utah Administrative Code and the Permittee's Emergency Spill Plan in Attachment 1.

I.E. Record Retention

I.E.1. The Permittee shall maintain all applicable used oil records required by R315-15 of the Utah Administrative Code and this Permit at the Permittee's facilities located at 5756 Alba Street Los Angeles, CA 90058.

I.E.2. All records shall be readily accessible for review by representatives of the Director. Records may be in a hard copy or electronic format. Records shall be maintained for a minimum of three years.

I.F. Tracking

I.F.1. The Permittee shall keep written transportation records for both the collection and delivery of used oil. Collection and delivery records may be a log, invoice, manifest, bill of lading or other shipping document.

I.F.2. The collection records shall include the generator's, transporter's, transfer facility's, off - specification burner's or processor's name and signature (dated upon receipt), address, volume of used oil collected and EPA identification number if applicable.

I.F.3. The halogen content from screening tests, analytical laboratory testing or generator knowledge shall be documented on the used oil record/bill of lading at each used oil collection location prior to loading for transportation. The halogen content determination method (i.e., test or generator knowledge) shall be documented on the shipping document with the halogen concentration in accordance with Attachment 2 (Procedures for Recording Halogen Content).

I.F.4. The Permittee shall document the PCB concentration based on analytical results of used transformer oil prior to collection and transport the record/bill of lading at each used oil collection location.

I.F.5. The delivery records shall include the Permittee's name, address, EPA identification number, vehicle designation number, driver name, date of delivery, the volume of used oil delivered and the type of delivery (i.e., bulk oil in tankers or containerized, specifying container types and numbers).

I.F.5.a. The used oil records shall include the receiving transfer facility's, off-specification burner's, processor's or other transporter's name and signature (dated upon receipt), address and EPA identification number.

I.F.5.b. The Permittee shall create a new delivery record for internal transfers between the Permittee's transportation vehicles.

I.G. Transportation Operations

I.G.1. The Permittee is authorized to transport used oil and deliver the used oil to another permitted transporter, transfer facility, processor and re-refiner or used oil burner in accordance with R315-15-4.4 of the Utah Administrative Code.

I.G.2. Transportation of oily water shall be managed as used oil if the used oil is destined to be recovered in accordance with R315-15 of the Utah Administrative Code and this Permit.

I.G.3. The Permittee shall only accept used oil or oily water subject to R315-15 of the Utah Administrative Code that has halogen concentrations less than 1,000 ppm unless rebutted in accordance with Attachment 3 (Analysis Plan) or unless the oil was generated by a Very Small Quantity Generator (VSQG) or Do-It-Yourselfer Collection Center (Type A or B).

I.G.4. The Permittee shall comply with TSCA regulations when transporting used oil with PCB concentrations greater than or equal to 50 mg/kg.

I.H. Sampling and Analysis Halogen Determination

I.H.1. The Permittee shall follow all sampling and analytical procedures in Attachment 3 (Analysis Plan) and Attachment 4 (Sampling Procedures) when conducting used oil sampling and analytical testing to meet the requirements of R315-15 of the Utah Administrative Code and this Permit.

I.I. Prohibited Waste

I.I.1. Used oil that has been mixed with hazardous waste as defined by R315-261 of the Utah Administrative Code or PCBs as defined by R315-301-2(53) of the Utah Administrative Code shall no longer be managed as used oil and shall be subject to applicable hazardous waste and PCB-contaminated waste rules.

I.I.2. Used oil shall not be stored in tanks, containers or storage units that previously stored hazardous waste unless these tanks, containers and storage units have been cleaned in accordance with R315-261-7 of the Utah Administrative Code.

I.I.3. The Permittee shall not place, manage, discard or otherwise dispose of used oil in any manner other than specified in R315-15-1.3 of the Utah Administrative Code.

I.J. Waste Disposal

I.J.1. The Permittee shall properly characterize used oil waste related material to determine if the wastes are hazardous or non-hazardous in accordance with R315-15-8 of the Utah Administrative Code and manage accordingly.

I.J.2. The Permittee shall maintain records showing characterization, handling and disposal of waste generated.

I.K. Used Oil Storage

I.K.1. The Permittee shall not store used oil in Utah longer than 24 hours without first obtaining a transfer facility or processor permit for that storage location. This includes storing used oil in vehicles at loading and unloading docks and parking areas.

I.K.2. The Permittee shall notify the Director if the 24-hour storage is exceeded due to mechanical failure of the Permittee's transportation vehicle prior to exceeding the 24-hour storage requirement.

I.L. Liability and Financial Requirements

I.L.1. The Permittee shall procure and maintain general liability and sudden used oil third-party environmental pollution liability coverage for the Permittee's operations as required by R315-15-10 of the Utah Administrative Code.

I.L.2. The Permittee shall provide documentation of financial responsibility, environmental pollution legal liability and general liability coverage annually to the Director for review and approval by March 1 of each reporting year with the Annual Report Form UO 004.

I.L.3. The Permittee shall provide documentation of financial responsibility, environmental pollution legal liability and general liability coverage to the Director upon request.

I.L.4. The Permittee shall notify the Director immediately of any changes to the extent and type of liability coverage in accordance with R315-15-10 of the Utah Administrative Code.

I.M. Used Oil Handler Certificate

I.M.1. In accordance with R315-15-4 of the Utah Administrative Code, the Permittee shall not operate as a used oil transporter without obtaining annually a Used Oil Handler Certificate from the Director. The Permittee shall pay a used oil handler fee, pursuant to Utah Code 63J-1-504, by December 31 of each calendar year to receive certification for the upcoming calendar year.

I.N. Inspection and Inspection Access

I.N.1. Any duly authorized employee of the Director may, at any reasonable time and upon presentation of credentials, have access to and the right to copy any records relating to used oil and to inspect, audit or sample. The employee may also make record of the inspection by photographic, electronic, audio, video or any other reasonable means to determine compliance.

I.N.2. An authorized employee may collect soil, groundwater or surface water samples to evaluate the facility's compliance.

I.N.3. Failure to allow reasonable access to the property by an authorized employee may constitute "denial of access" and may be grounds for enforcement action or permit revocation.

I.O. Annual Report

I.O.1. The Permittee shall prepare and submit an Annual Report to the Director by March 1 of the previous year. The Annual Report shall describe the Permittee's used oil activities in Utah and document financial assurance using the Division's Used Oil Transporter Annual Report form (UO 004) as required by R315-15-13.4 of the Utah Administrative Code.

I.P. Other Laws

I.P.1. Nothing in this Permit shall be construed to relieve the Permittee of his obligation to comply with any Federal, State or local law.

I.Q. Enforceability

I.Q.1. Violations documented through the enforcement process pursuant to Utah Code Annotated 19-6-112 may result in penalties in accordance with R315-102 of the Utah Administrative Code.

I.R. Effective Date

I.R.1. The permit is effective on the date of signature by the Director.

II.A. Transport Vehicle Requirements

II.A.1. The Permittee shall only transport used oil in the types of vehicles listed in Table II.A.

Table II.A: Vehicle Description

Type of Vehicle	Used Oil Capacity (gallons)
Box/Flatbed Trucks	3,850 gals
Tanker/VAC	7,000 gals

II.A.2. All bulk used oil transport vehicles operated by the Permittee shall have the words "USED OIL" on both sides of the transport vehicle in a contrasting color that is distinguishable from the background color and at least three inches tall. These designations shall be in place at all times the transport vehicle is transporting or storing used oil. Individual containers of used oil shall be labeled "Used Oil."

II.A.3. All Permittee's vehicles which transport used oil shall have a copy of the Permittee's Emergency Spill Plan (Attachment 1) maintained in the vehicle at all times.

II.A.4. The Permittee shall maintain Emergency Spill Cleanup materials in all vehicles used to transport used oil as specified in Attachment 1 (Emergency Spill Plan) of this Permit.

II.B. Used Oil Loading and Unloading Requirements

II.B.1. The Permittee shall determine if the halogen content is less than 1,000 ppm prior to loading the used oil in accordance with Attachment 3 (Analysis Plan). The result shall be recorded on the transportation document (e.g., bill of lading).

II.B.2. The Permittee shall secure the vehicle by positioning wheel chocks and applying the emergency brakes before loading or unloading used oil.

II.B.3. The Permittee shall inspect all used oil collection equipment, if applicable (e.g., vehicles and associated pumping equipment) for any damage prior to use.

II.B.4. The Permittee shall place buckets or other containers under piping connections to collect drips of used oil during loading and unloading operations.

II.B.5. The Permittee shall ensure the amount of used oil to be loaded into the transport vehicle will not exceed the carrying capacity. The Permittee shall utilize a calibrated gauging instrument to measure used oil volume in each collection vehicle/tanker.

II.B.6. The Permittee is not authorized to transfer used oil to or from rail cars.

II.C. Used Oil Sampling and Analysis

II.C.1. The Permittee shall determine the halogen concentration and PCB concentration, if applicable, prior to acceptance of the used oil as required in this Permit and Attachment 3 (Analysis Plan)

II.D. Rebuttable Presumption

II.D.1. Used oil with total halogen concentrations greater than 1,000 mg/kg (ppm) is presumed to have been mixed with a hazardous waste and shall be managed as a hazardous waste unless the Permittee successfully rebuts the presumption.

II.D.2 Used oil with halogen concentrations between 1,000 ppm and 4,000 ppm may be accepted for transport, if the Permittee rebuts the hazardous waste presumption or has analytical data documentation from a prior used oil handler that the used oil is not a hazardous waste or if the used oil is solely from a Very Small Quantity Generators (VSQG) or is DIYer used oil from a collection center. The Permittee shall attach any analytical results used to rebut the hazardous waste presumption to the shipping documents.

II.D.3. The Permittee may rebut the hazardous waste presumption in accordance with R315-15-4.5 of the Utah Administrative Code if the Permittee can demonstrate that the halogens in the used oil originated from sources other than halogenated hazardous constituents listed in Appendix VIII of 40 CFR 261.

II.D.4. If the additional testing shows that used oil has been mixed with a listed hazardous waste described in R315-261 of the Utah Administrative Code, the mixture is subject to regulation as a hazardous waste if the concentration of any individual compound listed in R315-261 Appendix VIII is greater than or equal to 100 mg/kg (ppm).

II.D.5. The rebuttable presumption does not apply to metalworking oils/fluids containing chlorinated paraffins if they are processed through a tolling arrangement as described in R315-15-2.5(c) of the Utah Administrative Code to reclaim metalworking oils/fluids. The rebuttable presumption does apply to metalworking oils/fluids if such oils/fluids are recycled in any other manner or disposed.

II.D.6. The rebuttable presumption does not apply to used oils contaminated with chlorofluorocarbons (CFCs) removed from refrigeration units if the CFCs are destined for reclamation. The rebuttable presumption does apply to used oils contaminated with CFCs that have been mixed with used oil from sources other than refrigeration units.

II.E. Used Oil Training

II.E.1. The Permittee shall train handlers of used oil in accordance with R315-15-4 of the Utah Administrative Code and the requirements of this Permit. New employees may not manage or process used oil without a trained employee present until used oil training is completed.

II.E.2. The Permittee shall document that employees are trained in the identification of used oil, recordkeeping requirements, emergency spill plan and facility used oil procedures for handling, transporting, sample collection, halogen screening and laboratory analytical methods, rebuttable presumption testing, and the appropriate use of "generator knowledge" when determining the halogen content of used oil

II.E.3. Employees collecting and performing field halogen testing shall be trained and demonstrate competence in collecting a representative used oil sample and testing for halogens using a CLOR-D-TECT® kit prior to fieldwork.

II.E.4. The Permittee shall provide, at a minimum, an annual used oil training refresher course for employees handling used oil. Additional training is required if the Permittee changes used oil handling procedures or this Permit is modified.

II.E.5. The Permittee shall keep training records for each employee for a minimum of three years. Employees and supervisors shall sign and date training attendance sheets to document class attendance.

II.F. Spill Response, Remediation, and Reporting

II.F.1. In accordance with R315-15-9.1(a) of the Utah Administrative Code, the person responsible for the spill shall immediately take appropriate action to minimize the threat to human health and the environment and notify the DEQ Hotline at (801) 536-4123 if the spill is greater than 25 gallons or for smaller spills that pose threat to human health or the environment.

II.F.2. Responders shall take action to prevent spill from spreading by utilizing absorbent, booms, pads, rags, etc. (Attachment 1- Emergency Spill Plan).

II.F.3. Once the material is containerized, a waste determination shall be made to determine the material's disposition.

II.F.4. The Permittee is responsible for the material release and shall recover oil and remediate any residue from the impacted soils, water, or other property, or take any other actions as required by the Director until there is no longer a hazard to human health or the environment.

II.F.5. All costs associated with the cleanup shall be at the expense of the Permittee.

II.F.6. Vehicle spill kits shall contain, at a minimum, the equipment listed in Attachment 1 (Emergency Spill Plan) of this Permit and shall be checked daily prior to collection activities.

II.F.7. The Permittee shall report all relevant information, including the amount of waste generated from cleanup efforts, the characterization of the waste (i.e. hazardous or non-hazardous), final waste determination, and disposal records. The report shall also include actions taken by the Permittee to prevent future spills.

II.F.8. An air, rail, highway or water transporter who has discharged used oil shall give notice, if required by 49 CFR 171.15, to the National Response Center at http://nrc.uscg.mil/nrchp.html, (800) 424-8802. In addition to the notification above, a written report, as required in 49 CFR 171.16, shall be presented to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau located in Washington, D.C., 20590.

II.F.9. In accordance with R315-15-9.4 of the Utah Administrative Code, the Permittee shall submit to the Director a written report within 15 days of any reportable release of used oil.

Attachment 1

Emergency Spill Plan

ENV SOP PR-12.3	**II.A. Title: SOP – Over the Road (OTR) Spill Contingency**
Effective Date: April 18, 2018	**Supersedes: ENV SOP PR-12.2 November 15, 2017**
Department:	Environmental
APPROVALS	J. Pennington Author *Jessica Pennington* Date: 4/18/18 Director of Environmental Compliance

Scope and Purpose

Emergencies that involve over-the-road (OTR) chemical release responses require prompt action to prevent or reduce adverse environmental, legal, and financial consequences. Therefore, Emerald Transformer has prepared this spill contingency plan to assist OTR drivers in the event of an emergency response.

Contingency Procedures

In any emergency incident, certain factors must be evaluated to determine the hazards and risks. The first step in a chemical spill response is to conduct an initial site characterization. This step is necessary to determine what hazards exist, the potential risks they pose, and what protective actions or measures should be accomplished to eliminate or reduce the threat. When performing this step, the following factors should be considered:

- identify the chemical/material involved in the release
- determine the amount of chemical/material involved
- the amount and rate of release if ongoing
- factors which influence the material's behavior (rainfall, wind direction, safety hazards, ignition source)

Other than the actual chemical or material that has been released, there could be a large number of other hazards present in a release. When approaching an incident, be aware of the following potential hazards;

- chemical exposure (inhalation, skin absorption, ingestion)
- explosion or fire
- physical hazards (slips, trips, falls, splash hazards)
- heat stress

Once the severity of the release is addressed, the driver (or designee) will notify the local fire and police departments. Upon arrival of the fire department or police department, the driver will immediately inform rescue personnel of the type and estimated quantity of chemical(s) released. Site control measures (cordon, evacuation) will be implemented to minimize potential exposure to emergency response personnel, to protect the public and others from immediate hazards, and to protect the environment from chemical contamination.

To limit contamination or exposure, the driver will request a restricted entry control point with physical barriers that can block off and control access to the scene. If necessary, post law enforcement personnel outside the contaminated area to further control entry.

Emergency Contact Numbers and Notification Procedures

Below is a list of Emerald Transformer emergency contact numbers.

Job Title	Name	Work Number	Cellular Number
General Manager (Nabb, IN and Twinsburg, Ohio)	Mike Plank	812-748-6185 330-425-3825	972-841-8250
General Manager (Lexington, MS)	Tom Sanchez	662-824-3033	662-457-0017
General Manager (Defuniak Springs, FL)	Andy Hall	850-892-2711	850-635-2006
General Manager (Coffeyville, KS)	Rich Bevans	620-252-1315	620-870-0851
General Manager (Los Angeles, California)	Steven Peterson	323-277- 2500	323-216-0436
General Manager (Tucker, Georgia)	Andy Carter	770-270-6575	678-315-4585
General Manager (Phoenix, Arizona)	Ryan Koronich	602-254-1976	602-399-3446
Regional Environmental Mgr (West)	Joe Christopher	323-277- 2500	323-351-1017
Regional Environmental Mgr (East)	Bonnie Martin	620-252-1315	602-206-1769
National Safety Manager (All)	Brian Fullen	330-425-3825	330-208-5181
Director Safety and Enviro. Compliance (Emerald)	Jessica Pennington	850-892-2711	850-333-8772

Emergency Response Contacts

In the event of a spill that threatens to enter any water source or waterway, or is otherwise imminently threatening to persons or property, the following are a list of Emergency Contacts to be used immediately

National Response Center **1-800-424-8802**

Regional Regulatory Contacts:

Region 1 / New England **(ME, NH, VT, MA, RI, CT)**: 1-888-372-7341

Region 2 NY and NJ 1-212-637-4050

Region 3 / Mid-Atlantic **(DE, MD, PA, VA, WV, DC)**: 1-800-438-2474

Region 4 / Southeast **(MS, TN, AL, GA, FL, KY, SC, NC)**: 1-800-241-1754 or 1-404-562-9900

Local Regulatory Contacts:

Florida Division of Emergency Management	1-800-226-4329
Florida Department of Environmental Protection	1-800-245-2118
DeFuniak Springs Fire Department	911 or 850-892-8503
Walton County Sheriff's Department	911 or 850-892-8111
Walton County Emergency Management	850-892-8065

Emergency Spill Response Contractor

SWS First Response (Southeast Regional Area)	1-800-852-8878
Hull's Environmental (FL and GA Area)	1-866-450-9077
Chemtrec (Northeast and Midwest)	1-800-262-8200
MP Environmental (Southwest)	1-800-833-7602

Region 5 / Upper Midwest **(IL, IN, MI, MN, OH, WI)**: 1-312-353-2000

Local Regulatory Contacts:

Emergency Spill Prevention/Response	312-353-2318
IN Department of Environmental Mgmt	317-232-8603
IN Dept of Env Mgmt Office of Emergency Response	317-233-7745
Jefferson County Sheriff	812-265-2648 (or 911)
New Washington Fire Department	812-293-4114
King's Daughter Hospital	812-265-4357

Region 6 / South Central **(AR, LA, NM, OK, TX)**: 1-214-665-2210

Region 7 / Midwest **(IA, KS, MO, NE)**: 1-800-223-0425

Region 8 / Mountains and Plains **(CO, MT, ND, SD, UT, WY)**: 1-303-312-6312

For spills exceeding 25 gallons, or smaller releases that pose a potential threat to human health or the environment particularly in the **State of Utah**, notify the Utah State Department of

Environmental Quality, 24 hour Answering Service at 801-536-4123. A written notice must be provided within 15 days to the Division of Waste Management and Radiation Control.

Region 9 / Pacific Southwest **(AZ, CA, HI, NV, Guam, American Samoa)**: 1-415-947-8713

Region 10 / Pacific Northwest **(AK, ID, OR, WA)**: 1-800-424-4372 or 1-206-553-4973

In the event the release requires notification to the National Response Center, Emerald Transformer Director of Environmental Compliance shall serve as the Emergency Coordinator. The Chemical Release Incident Investigation Form as attached will be used to document the events of the release from the driver so that it may be communicated to the appropriate emergency response agencies.

Follow –up procedures, including written notification requirements, will be forwarded to the attention of the appropriate Department of Transportation, Director of Hazardous Materials Registration, Materials and Transportation Bureau, Washington, DC 20590. Additionally, a copy will be sent to the appropriate Regional Contact.

Personal Protective Equipment

PPE must be selected based on the specific hazards and must be used in conjunction with other protective measures to ensure safety. The selection of the appropriate PPE is based on the identification of the chemical and associated hazards, potential routes of exposure, and the ability of the PPE materials and equipment to protect against these hazards.

In the event a driver is involved in an incidental chemical spill release, the following PPE should be considered:

- chemical resistant gloves
- chemical resistant aprons
- rubber boots
- face shield
- eye goggles

It is the responsibility of the local facility dispatch supervisor or transportation coordinator to equip all rolling assets with, at a minimum, the PPE listed here. A toolbox or other container may be affixed to contain these items.

It is the responsibility of the driver to ensure that the quantity and condition of the PPE stocked on his/her vehicle is accessible and the integrity of it is not compromised.

It is the responsibility of the local facility General Management to ensure the PPE is made available when necessary and always available to transportation associates, similar to facility personnel.

Defensive Containment and Control Measures

After the initial evaluation is complete and the safety of personnel is adequately addressed, defensive operations may begin. The purpose of defensive control is to capture, contain, or minimize the hazards. The containment and control measures should be used to ensure that the released chemical does not migrate into the ground, waterways, or enter the sewer system. This may be achieved through several methods, including:

- stopping the flow of the material – shut off any valves, turn tote upright, or place drum on its side to prevent or stop any additional flow
- absorption – pads, socks, floor dry
- dike, dam, diversion – the use of a barrier to prevent the material from entering waterways, storm water outfalls or areas which are not yet damaged or contaminated.

Clean Up and Decontamination

Once the release is controlled, clean up and restoration of the area affected and decontamination of truck/trailer, PPE and tools/equipment can begin.

The last step of a chemical spill response is to clean up the contaminated area. Clean up procedures do not always mean disposal. A response may involve pumping the material back into its original container or into another empty drum or tote for reuse. If unsalvageable, materials that were used in the containment and control of the spill will may require disposal. In these situations the material (contaminated chemical, contaminated absorbent material, PPE) will need to be placed in a DOT approved container, labeled properly, and disposed of by an approved vendor.

Decontamination is necessary to prevent the exposure of unprotected response personnel to chemical hazards. This involves physically removing the contaminants or changing their chemical nature. If the PPE used during the containment and control of the release cannot be decontaminated, then the PPE needs to be disposed and replaced as soon as possible.

Emergency Equipment

Each driver will carry the following emergency equipment:

- 2 x DOT approved containers (i.e. bucket or drum)
- Broom
- Chemical Resistant Gloves
- Goggles
- Slicker Suite
- 2 x's 50lb bag Granular Oil Absorbent (i.e. Oil-Dri, Zipzorb, etc.)
- Shovel

- Chemical Resistant Boots
- DOT Emergency Response Guidebook
- Emergency Reflective Triangles (3)
- First Aid Kit
- ABC Fire Extinguisher

It is the responsibility of the local facility dispatch supervisor or transportation coordinator to equip all rolling assets with, at a minimum, the Emergency Equipment listed here. A toolbox or other container may be affixed to contain these items.

It is the responsibility of the driver to ensure that the quantity and condition of the Emergency Equipment stocked on his/her vehicle is accessible and the integrity of it is not compromised.

It is the responsibility of the local facility General Management to ensure the Emergency Equipment is made available when necessary and always available to transportation associates, similar to facility personnel.

Responsibility

A copy of this plan must be reviewed by transportation personnel and maintained in each transportation vehicle.

Training

Each driver will receive training in the safe transportation of used oil material prior to the transportation of used oil or hazardous materials. The training outline is as follows:

Course Outline

Hazardous Material/Used Oil Transportation

A. Introduction
B. Regulatory Requirements
C. Definitions
D. Hazardous Material Table - Part 172 - Subpart B
   - Purpose
   - Use
E. Shipping Papers - Part 172 - Subpart C
F. Marking of Packaging - Part I72 - Subpart D
G. Labeling of Packages - Part 172 - Subpart E
H. Placarding of Vehicles -part 172 - Subpart F
I. Emergency Response and Reporting

-Part 171 - 171.15; 171.16
- Part 172 - Subpart G

J. Training

- Hazmat Employer
- Hazmat Employee
- Training Requirements

K. Packaging

- Non-Bulk
- Bulk
- Packaging Definitions

L. Student Evaluations

M. Other Specific Transportation Training Materials may be covered/reviewed at this time in regards to facility specific practices per State Regulations, etc.

N. Used Oil Transportation Training will also be covered as a training course for transportation personnel to include:

- Used Oil Transportation requirements per State,
- Over the Road Spill Response Procedures,
- Applicable Testing Procedures,
- Requirements regarding proper shipping documents and Recordkeeping

EMERALD TRANSFORMER

CHEMICAL RELEASE INCIDENT INVESTIGATION

1. NAME OF PERSON REPORTING RELEASE:_____
2. DATE AND TIME OF RELEASE:_____
3. TYPE OF CHEMICAL RELEASED (IF TRANSFORMER OIL PCB ppm VALUE):
   _____
4. LOCATION OF RELEASE:_____
5. DURATION OF THE RELEASE:_____
6. WHAT MEDIA WAS THE CHEMICAL RELEASED TO (LAND, WATER, AND/OR AIR)?
   _____
7. APPROXIMATE QUANTITY OF CHEMICAL RELEASED:_____
8. ANY INJURIES OR DAMAGE DUE TO RELEASE :_____
   _____
   _____
9. MEASURES TAKEN TO STOP RELEASE:_____
   _____
   _____
10. HOW DID RELEASE OCCUR:_____
    _____
    _____
    _____
11. COSTS INVOLVED IN CONTAINING AND CLEAN UP OF RELEASE (MATERIAL & LABOR)
    _____
    _____
12. CORRECTIVE ACTIONS TAKEN TO PREVENT REOCCURANCE:_____
    _____
    _____
    _____
    _____

IMMEDIATE SUPERVISOR SIGNATURE & DATE_____

GENERAL MANAGER SIGNATURE & DATE_____

FORWARD COMPLETED COPY TO SAEFTY AND ENVIRONMENTAL MANAGER

Attachment 2

Procedures for Recording Halogen Content

A. **General Procedures**

A.1. The Permittee's drivers shall document the halogen content of the used oil, the determination method and date of entry, if applicable, on the shipping record as follows:

B. **Bill of Lading (Daily record for single transporter)**

B.1. When the Permittee determines the halogen content using halogen field screening methods or laboratory analytical methods in accordance with Attachment 3(Analysis Plan) the driver shall record the following halogen information:

Halogens ≤ 1000 ppm/test

Halogens >1000 ppm/test

B.2. When the Permittee determines the halogen content using Generator Knowledge provided by the generator, the driver shall write the following:

Halogens ≤1000 ppm/GenKno

Halogens >1000 ppm/GenKno

*Note: The daily Bill of Lading must be dated.

C. **Manifest (record for single or multiple transporters)**

C.1. When the Permittee determines the halogen content using halogen field screening methods or laboratory analytical methods in accordance with Attachment 3 (Analysis Plan) the driver shall record the following halogen information and date the entry in the special handling box of the manifest.

Halogens≤ 1000 ppm/test date

Halogens >1000 ppm/test date

C.2. When the Permittee documents the halogen content using Generator Knowledge the driver shall write the following:

Halogens ≤1000 ppm/GenKno **(**Date)

Halogens >1000 ppm/GenKno (Date**)**

Attachment 3

Analysis Plan

A. General Requirements

A.1. The Permittee shall verify that the halogen content of the used oil collected prior to transport in accordance with at least one of the following halogen verification methods in accordance with B through D:

B. Halogen Field Screening Methods

B.1. If he Permittee screens the generator's used oil to verify halogen concentration, the Permittee shall use a halogen field screening method in accordance with the following requirements:

B.2. Used oil that contains less than 20% water shall be screened for halogens with a CLOR-D-TECT® halogen test kit (EPA Method 9077).

B.3. Used oil that contains between 20% and 70% water shall be screened for halogens with a HYDROCLOR-Q® test kit. The resulting halogen concentration must be corrected using the following conversion formula to calculate true halogen concentration.

True Halogen Concentration = Reading Syringe + [(10 + ml oil in sample)/10]

Example: sample contains 6 ml water and 4 ml oil (60% water) and the syringe reading is 2,000 ppm, then the true concentration is:

2,000 ppm [(10 + 4)/10] = 2,800 ppm

B.4. Used oil that contains greater than 70% water shall be screened for halogens with a HYDROCLOR-Q® test kit. Correction of the halogen screening results is not required.

B.5. The Permittee shall document on acceptance records or bill of lading the screening results.

B.6. The requirement for a quality control sample (duplicate) may be satisfied by testing prior to off-loading from permitted vehicles in accordance with the CLOR-D-TECT® kits (EPA Method 9077) and is not required for each load collected at individual generators.

C. Halogen Laboratory Analytical Methods

C.1. If the Permittee submits a representative used oil sample to a Utah-certified laboratory to analyze for total halogen concentration, the Permittee shall use Method 9076 or other equivalent method approved by the Director.

C.2. The Permittee shall document the analytical results on the transportation document such as a bill of lading or manifest.

D. Halogen Generator Knowledge Method

D.1. The Permittee shall have information on file, (e.g., analytical testing, industry process knowledge) from the generator which is sufficient, as determined by the Director, to support any use of generator knowledge.

D.2. The Permittee may not rely solely on a safety data sheet (SDS) in making a halogen concentration determination.

D.3. If relying on generator knowledge, the Permittee shall document on the shipping record the use of generator knowledge in accordance with Attachment 2 (Procedures for Recording Halogen Content).

D.4. Used oil determined to be on-specification by a Utah-registered marketer can be collected and transported without further testing. Bills of lading, manifests or other used oil transportation records shall include copies of the analytical results for reference.

E. PCB Contaminated Used Oil

E.1. The Permittee shall not accept for transport used oil with PCB concentrations greater than or equal to 50 mg/kg. Used oils containing PCB concentrations greater than or equal to 50 mg/kg are subject to TSCA regulations 40 CFR 761. Used oils containing PCB concentrations greater than or equal to 2 mg/kg but less than 50 mg/kg are subject to both R315-15 of the Utah Administrative Code and 40 CFR 761.

E.2. Table 1 lists required laboratory PCB sample preparation and analytical methods.

Table 1: PCB Sample Preparation and Analytical Methods

Sample Preparation Methods	Analytical Method	Analytes *	
		PCB CAS RN	***PCB Aroclor®***
3500C (General) 3580A (Preparation) 3665A (Cleanup)	• 8082A • Analyses of the Aroclors bolded/* in the last column are mandatory	**12674-11-2**	**1016***
		147601-87-4	1210
		151820-27-8	1216
		11104-28-2	**1221***
		37234-40-5	1231
		11141-16-5	**1232***
		71328-89-7	1240
		53469-21-9	**1242***
		12672-29-6	**1248***
		165245-51-2	1250
		89577-78-6	1252
		11097-69-1	**1254***
		11096-82-5	**1260***
		37324-23-5	1262
		11100-14-4	1268

E.3. The Permittee shall obtain analytical results of dielectric oil used in transformers and other high voltage devices, verifying the PCB concentrations are less than 50 mg/kg prior to loading the used oil into the transportation vehicle.

E.4. PCB used oil may not be diluted to avoid any provision of 40 CFR 761.

E.5. If PCB concentrations greater than or equal to 2 mg/kg have been transported, the Permittee shall assume that all subsequent loads of used oil are contaminated with PCBs and has a quantifiable PCB concentrations of 2 mg/kg or greater unless the equipment has been decontaminated as described in 40 CFR 761 Subpart S

Attachment 4

Sample Collection Procedures General

A.1. Enviro Care employees shall use the sampling procedures below to collect representative sample from customers' tanks and containers when screening used oil for halogen content prior to collection.

A.2. Drums or containers of used oil from different sources or processes shall be sampled individually at each generator's facility.

A.3. Composite sampling is only allowed for a maximum of 500 gallons from containers of used oil that are generated from the same source or process at each generator's facility.

B. **Procedure 1- Containers < 375 gallons**

B.1. Sampling Equipment

Composite Liquid Waste Sampler (COLIWASA) nominally 175 ml, 39 inch, sample jar.

B.2. Step 1

Take COLIWASA and dip into drum or tote make sure the tube fills up a good cross section before closing.

B.3. Step 2

Open sample jar and dispense the entire contents from COLIWASA into sample jar.

B.4. Step 3

Screen sample using CLOR-D-TECT halogen test kit in accordance with Attachment 3 (Analysis Plan).

B.5. Step 4

Empty the sample in the bucket back into the used oil container/tank.

C. Procedure 2 – Containers ≥ 375 gallons

C.1. Sampling Equipment

Composite Liquid Waste Sampler (COLIWASA)

C.2. Step 1

Lower a COLIWASA tube slowly into the liquid waste at a rate that allows the liquid level inside and outside the tube to equalize.

C.3. Step 2

Slowly withdraw COLIWASA tube from the liquid. Either wipe the exterior of the sampler tube with a disposable cloth or allow excess liquid to drain back into the used oil container/tank.

C.4. Step 3

Discharge the sample by placing the lower end of the tube into a sample container.

C.5. Step 4

Screen sample(s) using the appropriated halogen screening test kit(s).

C.6. Step 5

As appropriate, note that the halogen screening result of the used oil tested was < 1000 ppm halogens and document results on the BOL.